REMARKS

Rejections under 35 U.S.C. § 112

Claims 31, 25, 35 and 38-65 stand rejected under 25 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. In particular, the Examiner states that the claimed elements of 1) selecting a pixel value based on a number of occurrences of the pixel value in two idle graphics frames, and 2) representing the pixel value in an idle graphics frame with a code to compress the idle graphics frame, are not supported by Applicant's specification.

Applicant respectfully directs the Examiner's attention to paragraphs 9 through 12, and Figure 2, of Applicant's specification. The first sentence in paragraph 19 reads:

> The graphics controller 101 evaluates two idle frames to determine which pixel byte values predominate the values in the idle frame and creates an encoding look-up table from the results as illustrated in Figure 2.

The remainder of paragraph 9 through paragraph 12 describe an embodiment in which a series of counters are used to determine the pixels that occur most frequently in two idle frames, and the creation of a encoding look-up table (220) based on the most frequent pixels. Figure 4A is a flow chart illustrating a corresponding method as described at paragraphs 18-19.

Applicant also respectfully directs the Examiner's attention to paragraphs 13 through 16, and Figure 3. The first sentence of paragraph 13 reads:

> The graphics controller 101 uses the look-up table 220 to compress subsequent idle frames.

The remainder of paragraph 13 through paragraph 16 describe four different compression modes (*see* Table 1) that may be implemented using a look-up table, such as look-up table 220. Figure 4B is a flow chart illustrating a corresponding compression method as described at paragraphs 20-22.

The enablement requirement of 35 U.S.C. § 112, first paragraph is met when one of skill in the art can make or use the invention, based on the disclosure, *without undue experimentation*. Applicant respectfully submits that the above-cited paragraphs and figure are more than sufficient to enable one of skill in the art to reproduce the invention with little, if any, experimentation.

Furthermore, the portions of Applicant's specification that support the invention as claimed <u>must be taken as being in compliance</u> with 35 U.S.C. § 112, first paragraph, "unless there is a reason to doubt the objective truth of the statements" [MPEP §2164.04]. Thus, if the Examiner continues to assert the rejection of the claims for lack of enablement, the Examiner must supply a cogent reason and/or evidence that the cited paragraphs and figures of the specification are either untrue or inaccurate:

> [I]t is incumbent upon the Patent Office, whenever a rejection on this basis is made, to explain *why* it doubts the truth or accuracy of any statement in a supporting disclosure and to back up assertions of its own with acceptable evidence or reasoning which is inconsistent with the contested statement. [MPEP §2164.04]

Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 31, 25, 35 and 38-65 under 35 U.S.C. § 112, first paragraph.

SUMMARY

Claims 31, 35, 36 and 38-65 are currently pending. In view of the foregoing remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-8300 x309.
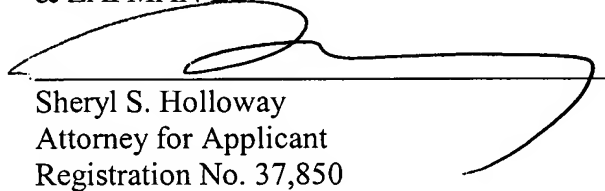
Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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